

THE HONORABLE THOMAS S. ZILLY

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

HUNTERS CAPITAL, LLC, a Washington limited liability company, HUNTERS PROPERTY HOLDINGS, LLC, a Washington limited liability company, GREENUS BUILDING, INC., a Washington corporation. SRJ ENTERPRISES, d/b/a CAR TENDER, a Washington corporation, THE RICHMARK COMPANY d/b/a RICHMARK LABEL, a Washington company, ONYX HOMEOWNERS ASSOCIATION, a Washington registered homeowners association, MATTHEW PLOSZAJ, an individual, WADE BILLER, an individual, MADRONA REAL ESTATE SERVICES LLC, a Washington limited liability company, MADRONA REAL ESTATE INVESTORS IV LLC, a Washington limited liability company, MADRONA REAL ESTATE INVESTORS VI LLC, a Washington limited liability company, 12TH AND PIKE ASSOCIATES LLC, a Washington limited liability company, REDSIDE PARTNERS LLC, a Washington limited liability company, OLIVE ST APARTMENTS LLC, a Washington limited

Case No. 2:20-cv-00983-TSZ

DECLARATION GABRIEL REILLY-BATES IN SUPPORT OF PLAINTIFFS' RESPONSE IN SUPPORT OF CITY OF SEATTLE'S MOTION TO SEAL

Noted: February 25, 2022

DECLARATION OF GABRIEL REILLY-BATES
IN SUPPORT OF PLAINTIFFS' RESPONSE
IN SUPPORT OF CITY OF SEATTLE'S
MOTION TO SEAL
(Case No. 2:20-cv-00983-TSZ) - 1

LAW OFFICES
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1 liability corporation, BERGMAN'S LOCK
2 AND KEY SERVICES LLC, a Washington
3 limited liability company, on behalf of
4 themselves and others similarly situated,
5 SHUFFLE LLC d/b/a CURE COCKTAIL, a
6 Washington limited liability company, and
7 SWAY AND CAKE LLC, a Washington
8 limited liability company,

Plaintiffs,

vs.

CITY OF SEATTLE,

9
10 I, Gabriel Reilly-Bates, declare as follows:

11 1. I am an attorney with Calfo Eakes LLP and represent Plaintiffs in the above-
12 captioned action. I am over eighteen years of age and am competent to testify herein. I make the
13 following statements based on my personal knowledge.

14 2. On Friday, February 4, 2022, counsel for the City sent me and Tyler Weaver an
15 email containing 8 documents and 6 deposition transcript excerpts that the City indicated it would
16 submit in support of its Opposition, in preparation of a meet and confer conference scheduled for
17 Monday, February 7, 2022, to satisfy the parties' meet-and-confer obligations under LCR 5(g).

18 3. On Sunday, February 6, 2022, counsel for City sent us another email with an
19 addition 9 documents and 2 deposition transcript excerpts.

20 4. We conducted a review of the proposed exhibits and deposition transcripts and
21 determined that 12 of the confidential exhibits or deposition transcript excerpts could be filed
22 publicly without any redactions, while others required only sparse redactions of terms of leases or
23 other contracts.

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